

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRACY LEE HURST-CASTL,

Case No.: 2:25-cv-00752-APG-NJK

Plaintiff

Order Declaring Plaintiff Tracy Lee Hurst-Castl a Vexatious Litigant

V.

SABLES, LLC,

Defendant

[ECF No. 39]

Sables, LLC moves for an order declaring Tracy Lee Hurst-Castl a vexatious litigant.

9 ECF No. 39. Based on Hurst-Castl's history of filing frivolous legal actions and papers, I grant
10 the motion.

I. BACKGROUND

A. The Loan and Default

On June 1, 2007, Hurst-Castl entered into a promissory note (Note) with Washington Mutual Bank (WaMu) for the principal amount of \$2,250,000. The Note was secured by a deed of trust (the Deed of Trust, and collectively with the Note, the Loan) on Hurst-Castl's real property located at 3910 White Fir Way, Mt. Charleston, Nevada (the Property). ECF No. 1-1 at 32. Hurst-Castl defaulted on the Loan in 2008 and has not made any payments on the Note since then.

B. First Three Bankruptcies and Adversary Proceeding

20 On June 8, 2010, Hurst-Castl filed the first bankruptcy case that affected the Property
21 (Case No. 10-20635-bam, Bankr. Dist. Nev.). That case was dismissed on August 6, 2010 after
22 Hurst-Castl failed to file any schedules or statements. *See* Case No. 10-20635-bam, ECF No. 23.
23 On September 24, 2010, Hurst-Castl filed her second bankruptcy (Case No. 10-28140-bam,

1 Bankr. Dist. Nev.). While that bankruptcy was pending, on June 24, 2011, Hurst-Castl filed an
 2 adversary proceeding (Case No. 11-01166-bam, Bankr. Dist. Nev.) against JPMorgan Chase
 3 Bank and California Reconveyance Company (the then beneficiary and trustee, respectively, of
 4 the Deed of Trust)¹ and other defendants on other loans secured by other properties. She
 5 asserted claims for wrongful foreclosure, conspiracy to defraud, offering false instruments for
 6 record, quiet title, and determination of creditor status based on an allegation that the Loan was
 7 improperly securitized and thus the defendants were not the true beneficiaries or real parties in
 8 interest. ECF No. 40-1. Hurst-Castl failed to serve any of the defendants, and the case was
 9 voluntarily dismissed on November 9, 2011. *See Case No. 11-01166-bam, ECF No. 9.* Hurst-
 10 Castl's second bankruptcy was dismissed on September 14, 2012 after she failed to timely file
 11 required reports and to confirm a Chapter 11 plan of reorganization. *See Case No. 10-28140-*
 12 *bam, ECF No. 220.* Approximately three months later, on December 21, 2012, Hurst-Castl filed
 13 a third bankruptcy (Case No. 12-23874-btb, Bankr. Dist. Nev.). That case was dismissed on
 14 May 6, 2014, after Hurst-Castl failed to comply with the bankruptcy court's orders. *See Case*
 15 *No. 12-23874-btb, ECF No. 241.*

16 C. **Foreclosure Mediation**

17 On June 10, 2015, PennyMac Mortgage Investment Trust Holdings I, LLC (then holder
 18 of the Loan) began nonjudicial foreclosure proceedings on the Property by recording a Notice of
 19 Default and Election to Sell. Hurst-Castl elected to participate in the Nevada Foreclosure
 20 Mediation Program. The parties were unable to agree to a loan modification, and the mediator
 21
 22

23 ¹ The Note and Deed of Trust went through a series of assignments between 2008 and 2022, all of which
 are reflected in recorded documents of which this court may take judicial notice. ECF Nos. 16-5 through
 16-10.

1 found that PennyMac had complied with all the program's requirements and could proceed with
2 foreclosure. ECF No. 40-3 at 2.

3 **D. First State Court Quiet Title Action**

4 On September 14, 2015, Hurst-Castl filed a quiet title complaint against WaMu in
5 Nevada state court (Case No. A-15-724525-C, Eighth Jud. Dist. Ct.). Her primary claim was
6 that WaMu was not in possession of her Note when WaMu was put into receivership, so any
7 subsequent transfer of the Loan was invalid. ECF No. 40-4 at 4-5. Hurst-Castl failed to serve
8 WaMu, and she voluntarily dismissed the action on August 23, 2016.

9 **E. Petition for Judicial Review of Foreclosure Mediation**

10 On October 29, 2015, Hurst-Castl filed a Nevada state court petition for judicial review
11 of the ill-fated foreclosure mediation, in which she alleged that PennyMac did not engage in
12 good faith (Case No. A-15-726907-J, Eighth Jud. Dist. Ct.). On July 18, 2016, the state district
13 court denied Hurst-Castl's petition and held that PennyMac had complied with all document
14 production requirements and established its authority to foreclose. ECF No. 40-3 at 5. Hurst-
15 Castl appealed the ruling to the Nevada Court of Appeals (Case No. 71082-COA).

16 **F. Second State Court Quiet Title Action**

17 While that appeal was pending, on August 26, 2016 Hurst-Castl filed a lawsuit against
18 PennyMac in Nevada state court, asserting claims for trespass, quiet title, and declaratory and
19 injunctive relief (Case No. A-16-742267-C, Eighth Jud. Dist. Ct.). She alleged that her
20 signature on the Note produced by PennyMac was forged and that the statute of limitations
21 barred PennyMac from foreclosing on the Property. ECF No. 40-5. PennyMac moved to
22 dismiss, which the state district court granted on November 18, 2016. ECF No. 40-6 at 5:10-11.
23 Hurst-Castl appealed that order to the Nevada Court of Appeals (Case No. 71990-COA), which

1 was consolidated with her earlier appeal of the denial of her petition for judicial review (Case
 2 No. 71082-COA).

3 On May 9, 2018, the Nevada Court of Appeals affirmed the district court's denial of
 4 Hurst-Castl's petition for judicial review, thus affirming that PennyMac was the valid
 5 beneficiary and assignee of the Note and Deed of Trust, that PennyMac complied with all
 6 Foreclosure Mediation Program requirements, and that PennyMac could properly proceed with
 7 foreclosure. ECF No. 40-7 at 6. As for the quiet title action, the court of appeals held that no
 8 statute of limitations prevented PennyMac from pursuing a nonjudicial foreclosure, but it
 9 remanded the remaining claims, as it found the district court had improperly relied on res
 10 judicata as the basis for their dismissal. *Id.* at 6-9.

11 Following remand, the state district court conducted a trial on Hurst-Castl's claims and
 12 entered its findings of fact, conclusions of law, and judgment on December 4, 2020. The court
 13 reiterated that the "Court of Appeals found that PennyMac has the beneficial interest under the
 14 Loan and the legal authority to foreclose on the Property." ECF No. 40-6 at 5:17-18. The court
 15 also found that Hurst-Castl "has initiated numerous legal actions in an attempt to avoid repaying
 16 the Loan after she defaulted on the Loan in 2008." *Id.* at 9:7-10. As to Hurst-Castl's forgery
 17 allegation, the court held:

18 Given the overwhelming evidence, including Plaintiff's admissions that:
 19 (1) Plaintiff received the proceeds from the Loan; (2) Plaintiff used the proceeds
 from the Loan to pay off \$1,538,610.00 of her pre-existing debt on the Property;
 20 (3) Plaintiff received \$636,443.65 in cash from the Loan; (4) Plaintiff's
 inconsistent positions taken in prior judicial proceedings; and (5) the Court's
 own observation of the signatures, this Court finds Plaintiff's assertion that a
 single signature on the Note was forged is not credible and that Plaintiff failed to
 overcome the statutory presumption [of validity] at trial.
 22

23 *Id.* at 11:21-27 (correcting typographical error in original).

1 **G. Appeal to the Supreme Court of Nevada**

2 Hurst-Castl appealed the district court's order to the Supreme Court of Nevada (Case
3 No. 82296) on December 31, 2020. Over the course of 15 months, Hurst-Castl obtained eight
4 extensions of time to file her opening brief, but failed to file it. ECF No. 40-8 at 7. Ultimately,
5 on May 13, 2022, the court dismissed the appeal, explaining that it could not allow Hurst-Castl
6 to "indefinitely delay the briefing of this appeal." *Id.*

7 **H. 2023 Bankruptcy**

8 On February 4, 2023, Hurst-Castl filed her fourth bankruptcy (Case No. 23-10410-gs,
9 Bankr. Dist. Nev.). Long Term Capital Partnership VI, LLC (LTCP), PennyMac's successor in
10 interest, filed a proof of claim for approximately \$4 million secured by the Property. Hurst-
11 Castl objected to LTCP's claim, raising the same statute of limitations argument that had been
12 rejected by the state district court and affirmed by the Nevada Court of Appeals. ECF No. 40-9.
13 After briefing and a hearing, the bankruptcy court entered an order on June 20, 2023 finding that
14 Hurst-Castl had not presented sufficient evidence to overcome the presumptive validity of
15 LTCP's claim, thus overruling Hurst-Castl's objection and allowing LTCP's claim to proceed.
16 ECF No. 16-14.

17 **I. Adversary Proceeding and Appeal**

18 On October 11, 2023, Hurst-Castl initiated an adversary proceeding against LTCP and
19 FCI Lender Services, Inc. (FCI), the servicer of the Loan (Case No. 23-01132-gs, Bankr. Dist.
20 Nev.). Hurst-Castl also named LTCP's and FCI's bankruptcy counsel as defendants. In her
21 adversary complaint, Hurst-Castl accused LTCP, FCI, and their counsel of fraudulently filing a
22 proof of claim based on a fabricated assignment of deed of trust. ECF No. 40-10. The adversary
23 proceeding was dismissed on January 17, 2024 due to the dismissal of the Hurst-Castl's

1 underlying bankruptcy proceeding. Case No. 23-01132-gs, ECF No. 30. Hurst-Castl appealed
2 the dismissal to the Ninth Circuit Bankruptcy Appellate Panel (Case No. 0:24-bk-1021, B.A.P.
3 9th Cir.), which ultimately dismissed the appeal as moot after Hurst-Castl filed a new
4 bankruptcy case. *Id.*, ECF No. 59.

5 **J. 2024 Bankruptcy and Appeal**

6 On September 3, 2024, Hurst-Castl filed her fifth bankruptcy (Case No. 24-14610-gs,
7 Bankr. Dist. Nev.). On November 15, 2024, LTCP moved the bankruptcy court for relief from
8 the automatic stay so that it could foreclose on the Property. Case No. 24-14610-gs, ECF No.
9 61. The bankruptcy court granted the motion, finding that Hurst-Castl's bankruptcy had been
10 filed as part of a scheme to delay, hinder, and defraud LTCP, and allowing LTCP to move
11 forward with foreclosure. Case No. 24-14610-gs, ECF No. 104. Specifically, in its oral ruling
12 entered on January 10, 2025, the court found that "the record demonstrates that [Hurst-Castl]
13 continuously used bankruptcy and state court litigation to thwart all efforts of her secured
14 creditor to foreclose on the secured debt":

15 The record now shows that PennyMac assigned the beneficial interest in the deed
16 of trust of [sic] Long Term. And Long Term has presented evidence that it holds
17 the promissory note and -- which is endorsed in blank. Still, the debtor seeks to
18 relitigate the matters from which she has previously agreed she owes, and she
19 has previously lost in both bankruptcy court and the state court. The record
unequivocally establishes that the debtor has used multiple bankruptcy filings,
among other litigation, to stop the foreclosure of her property as part of a lengthy
and continuous scheme to hinder and delay her secured creditors, of which Long
Term is the most recent.

20 She has been in continuous default under those obligations since 2008 and seeks
21 again to delay any secured debt while she takes another run at challenging the
underlying obligation and deed of trust. In doing so, she once again has ignored
22 the preclusive effect of the state court's decision in the second quiet title action,
which she failed to pursue on appeal.

1 ECF No. 40-11 at 39:4-23. Hurst-Castl appealed the bankruptcy court's ruling to the
 2 Bankruptcy Appellate Panel (Case No. 0:25-bk-1045, B.A.P. 9th Cir.), which appeal is
 3 currently pending. Hurst-Castl additionally made a series of filings in opposition to the
 4 ruling, none of which was resolved in her favor.² LTCP filed a proof of claim in that
 5 bankruptcy proceeding. Hurst-Castl again objected to LTCP's claim, which the
 6 bankruptcy court yet again overruled. ECF Nos. 40-12, 40-13.

7 **K. First Federal District Court Case and Foreclosure Sale**

8 Shortly after LTCP moved for relief from the automatic stay in the bankruptcy court, on
 9 December 13, 2024 Hurst-Castl filed a lawsuit in this district court against LTCP and FCI (Case
 10 No. 2:24-cv-02334-GMN-MDC). In that case, Hurst-Castl again attempted to challenge the
 11 validity of LTCP's interest in the Loan and its authority to foreclose on the Property based on
 12 the same arguments and factual premises she alleged in the 2011 adversary proceeding, 2015
 13 petition for judicial review, 2016 quiet title action, 2023 adversary proceeding, and 2023 and
 14 2024 bankruptcy proceedings. Hurst-Castl later amended her complaint, adding several causes
 15 of action and attaching over 1,000 pages of exhibits. *See* Case No. 2:24-cv-02334-GMN-MDC,
 16 ECF No. 20.

17 In the meantime, with the automatic stay lifted, LTCP moved forward with foreclosure
 18 by scheduling the trustee's sale of the Property for April 4, 2025. In response, Hurst-Castl filed
 19 four different "emergency motions" in the span of one week, attempting to prevent the
 20 foreclosure. *See* Case No. 2:24-cv-02334-GMN-MDC, ECF Nos. 35, 40, 47, 48. The trustee
 21 sale proceeded as scheduled on April 4, 2025, with LTCP purchasing the Property via credit bid.

22
 23² *See* Case No. 24-14610-gs, ECF No. 90 (objection to the order), ECF No. 117 (motion to
 vacate), ECF No. 119 (motion to reconsider), ECF No. 131 (motion to stay pending appeal), ECF
 No. 143 (renewed motion to stay).

1 LTCP received title by way of a Trustee's Deed Upon Sale recorded on April 9, 2025. On April
2 30, 2025, Judge Navarro denied all of Hurst-Castl's motions for injunctive relief and dismissed
3 the case with prejudice. ECF No. 40-15.

4 In dismissing Hurst-Castl's complaint, Judge Navarro found that all of Hurst-Castl's
5 claims were barred by the doctrine of res judicata. She held that the order of the Nevada state
6 court in the 2016 quiet title action was "a final judgment on the merits that precludes any
7 attempt by Hurst-Castl to challenge the validity of the Promissory Note and Deed of Trust, or
8 the validity of the transfer to PennyMac, which was eventually transferred to Defendant LTCP."
9 *Id.* at 11-12. She also found that the 2023 bankruptcy court order overruling Hurst-Castl's
10 objection to LTCP's proof of claim "held that Defendant LTCP has a valid claim against [Hurst-
11 Castl] secured by the Property." *Id.* at 12. Judge Navarro also rejected Hurst-Castl's argument
12 that the previous court orders issued against her were "obtained by fraud," holding that "[Hurst-
13 Castl's] allegations of fraud are reiterations of her claims challenging the validity of the
14 Promissory Note and Deed of Trust, which she has asserted since 2016. The fraud and
15 misrepresentation that Hurst-Castl alleges were litigated in the previous actions." *Id.* at 13.

16 Hurst-Castl filed a 163-page motion for reconsideration of the order of dismissal on May
17 28, 2025, a 169-page supplement to her motion for reconsideration on June 9, 2025, a second
18 supplement on June 11, 2025, and a notice of supplemental authority on July 1, 2025. See Case
19 No. 2:24-cv-02334-GMN-MDC, ECF Nos. 71, 73, 75, 77. Judge Navarro denied
20 reconsideration on November 7, 2025. *Id.*, ECF No. 91. Following that order, Hurst-Castl
21 moved to alter or amend the judgment on November 20, 2025. *Id.*, ECF No. 92. Judge Navarro
22 denied that motion and directed the Clerk to not permit any further filings by Hurst-Castl in that
23 case. *Id.*, ECF No. 93.

1 **L. The Present Lawsuit**

2 While Hurst-Castl's first federal district court case was still pending, on April 18, 2025,
3 she filed a new case in Nevada state court, this time naming only Sables, the foreclosing trustee,
4 and bringing claims for wrongful foreclosure, quiet title, fraud, abuse of process, civil
5 conspiracy, intentional infliction of emotional distress, unjust enrichment, and slander of title.
6 ECF No. 1-1. Hurst-Castl also filed an ex parte motion for a temporary restraining order, which
7 the state court granted on April 25, 2025. *See* ECF No. 1-2 at 296-97. Sables removed the case
8 to this court, then moved to dismiss the action and to declare Hurst-Castl a vexatious litigant. I
9 have granted the motion to dismiss by separate order.

10 **II. LEGAL STANDARD**

11 The All Writs Act, 28 U.S.C. §1651(a), empowers federal district courts to enjoin
12 vexatious litigants who have a history of abusing the court's limited resources. *De Long v.*
13 *Hennessey*, 912 F.2d 1144, 1147 (9th Cir. 1990) (citing *Tripathi v Beaman*, 878 F.2d. 351, 352
14 (10th Cir. 1989)). Restrictions imposed on vexatious litigants must be narrowly tailored but
15 may include prohibiting the litigant from filing future actions against a particular party or
16 regarding particular issues without first demonstrating to the court that the proposed action is
17 not frivolous. *Id.* at 1148.

18 In deciding whether to restrict a litigant's access to the courts, the court must consider
19 "whether a litigant who has a history of vexatious litigation is likely to continue to abuse the
20 judicial process and harass other parties." *Molski v Mandarin Touch Rest.*, 347 F Supp.2d 860,
21 863-64 (C.D. Cal. 2004) (quoting *Safir v. United States Lines, Inc.*, 792 F.2d 19, 23 (2d Cir.
22 1986)). Because prefilings requirements contravene the presumption favoring public access to
23 the courts, such orders are considered extreme remedies and should be entered only "after a

1 cautious review of the pertinent circumstances.” *Molski v. Evergreen Dynasty Corp.*, 500 F.3d
 2 1047, 1057 (9th Cir. 2007). Before issuing a prefiling restriction, a court must:

- 3 (1) give the litigant notice and an opportunity to be heard;
- 4 (2) create an adequate record for review, including all pertinent cases and motions;
- 5 (3) make substantive findings regarding the frivolous or harassing nature of the litigant’s
 actions; and
- 7 (4) narrowly tailor the order to address the objectionable conduct without unduly
 restricting the litigant’s access to the courts.

9 *De Long*, 912 F.2d. at 1147-48

10 Steps one and two are procedural in nature, while steps three and four are substantive.

11 In addressing steps three and four, the Ninth Circuit has adopted the Second Circuit’s five-factor
 12 framework (the *Safir* factors) to evaluate the vexatiousness of the party’s actions and the
 13 appropriateness of the proposed remedy. The court should consider:

- 14 (1) the litigant’s history of litigation and in particular whether it entailed
 vexatious, harassing or duplicative lawsuits; (2) the litigant’s motive in
 pursuing the litigation, e.g., does the litigant have an objective good faith
 expectation of prevailing?; (3) whether the litigant is represented by counsel;
 (4) whether the litigant has caused needless expense to other parties or has
 posed an unnecessary burden on the courts and their personnel; and
 (5) whether other sanctions would be adequate to protect the courts and other
 parties.

19 *Molski*, 500 F.3d at 1058 (quoting *Safir*, 792 F.2d at 24).

20 III. ANALYSIS

21 1. *Hurst-Castl has had adequate notice and opportunity to be heard.*

22 Hurst-Castl received notice by virtue of Sables’ motion to declare her a vexatious
 23 litigant. She has had an opportunity to be heard because she filed a response to the motion.

1 That “is sufficient to satisfy the first factor.” *Bailey v. Suey*, No. 2:12-cv-01954-JCM-CWH,
2 2014 WL 3897948, at *4 (D. Nev. Aug. 11, 2014) (internal citation omitted). *See also Balik v.*
3 *City of Torrance*, 841 F. App’x 21, 22 (9th Cir. 2021) (holding that a litigant is not entitled to a
4 hearing before being declared a vexatious litigant).

5 ***2. Sables presents a suitable record for review, setting forth cases and motions
6 that support the requested relief.***

7 The second *De Long* requirement regards the preparation of a suitable record for
8 appellate review. Sables’ motion details the lengthy litigation history Hurst-Castl has pursued
9 regarding the Property. I have summarized the relevant proceedings above. This record is
10 adequate for appellate review.

11 ***3. An analysis under the Safir factors shows that Hurst-Castl’s litigation history
12 includes a pattern of repetitive and frivolous claims, harassment of opposing
13 parties, and an abuse of the judicial system.***

14 Under the third step in *De Long*, I must make substantive findings of Hurst-Castl’s
15 frivolous, harassing, or abusive litigation. To make these findings, I analyze the relevant
16 documents and procedural history using the five *Safir* factors.

17 **a. History of Litigation**

18 Hurst-Castl has filed several state and federal actions against Sables, LTCP, LTCP’s
19 predecessors in interest, and others in privity with Sables and LTCP based on the same set of
20 facts. Court after court has informed Hurst-Castl that her claims are precluded or has otherwise
21 rejected her arguments with regard to the Property. Despite continuously losing, she has
22 insisted on bringing the same or similar claims based on the same or similar underlying
23

1 allegations. Her conduct is clearly vexatious, harassing, and abusive to the parties and the
2 courts.

3 **b. Hurst-Castl's Motive**

4 In determining Hurst-Castl's motive, I consider whether she has an objective good faith
5 expectation of prevailing in her lawsuits. *Molski v. Evergreen*, 500 F.3d at 1058. While Hurst-
6 Castl perhaps has a subjective belief that she will prevail, I cannot find that she has an objective,
7 good faith expectation of prevailing, based on the repeated dismissals by prior courts that have
8 considered her claims and arguments. No reasonable litigant would believe she had a chance to
9 succeed after so many repeated rejections.

10 **c. Representation of Counsel**

11 The third *Safir* factor requires me to consider whether Hurst-Castl is represented by
12 counsel. She is currently proceeding pro se but has at times been represented by counsel.
13 Declaring a pro se plaintiff a vexatious litigant "should be approached with particular caution,"
14 but they are not immune from a vexatious litigation finding. *De Long*, 912 F.2d at 1147.

15 **d. Expense to Defendants and Burden on Courts**

16 Under the fourth *Safir* factor, I consider the expenses and burdens opposing parties and
17 the courts have incurred because of Hurst-Castl's abusive litigation. As detailed above, she has
18 filed multiple similar suits and bankruptcy proceedings, and her arguments have been rejected
19 each time. The courts have undoubtedly spent hundreds of hours adjudicating these matters,
20 and the various defendants have expended considerable resources in time and money litigating
21 these claims.

e. Other Sanctions

2 Recognizing the severe nature of this remedy, I must consider whether lesser sanctions
3 would likely curtail Hurst-Castl's abusive behavior. Her history of recycling rejected claims
4 and arguments in both federal and state courts suggests that no lesser action is likely to deter
5 her. A narrowly tailored prefiling review order is the most appropriate method to curb Hurst-
6 Castl's abuse of the litigation process.

4. A narrowly tailored prefiling order is an appropriate remedy.

8 *De Long*'s final step requires me to ensure that the remedy is not overbroad, given the
9 important policy favoring public access to the courts. *De Long*, 912 F.2d at 1148. After careful
10 consideration of all the relevant factors, I conclude that the best way to curtail Hurst-Castl's
11 abusive behavior is to require prefilings approval of her proposed future lawsuits. This remedy
12 will not prevent her from filing other suits unrelated to this Property and Loan, but it will protect
13 Sables and those in privity with Sables from future claims regarding the Property.

14 | IV. CONCLUSION

15 I THEREFORE ORDER that Sables' motion to declare Hurst-Castl a vexatious litigant
16 (**ECF No. 39**) is GRANTED.

17 I FURTHER ORDER that Tracy Lee Hurst-Castl is hereby declared a vexatious litigant
18 and enjoined and prohibited from commencing a new action with a case-initiation document
19 (whether complaint, petition, or otherwise) in the United States District Court for the District of
20 Nevada regarding the Property or Loan discussed in this order without first obtaining prefiling
21 permission from the Chief Judge of this district. This means that, if Hurst-Castl desires to file a
22 new action in the United States District Court for the District of Nevada:

- She must first apply to the Chief Judge of this district for leave to file the document by submitting to the clerk's office an application bearing the title "Application to Chief District Judge Seeking Leave to File."
 - The application must be supported by a declaration from Hurst-Castl, made under penalty of perjury, stating that: (1) the matters asserted in the new complaint or petition do not relate to the Property or the Loan; (2) the new claim or claims are not frivolous or made in bad faith; and (3) she has conducted a reasonable investigation of the facts and such investigation supports the claims.
 - She must attach a copy of this order to the application. The failure to fully comply with this order will constitute sufficient grounds for denial of the application.

This order also applies to actions originally filed in Nevada state court and removed to federal court, and to adversary proceedings in this district's bankruptcy court.

I FURTHER ORDER that the Clerk of Court is authorized to reject, refuse to file, and discard any new case-commencement document submitted without prior compliance with this order.

DATED this 2nd day of December, 2025.

ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE